

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

- v -

JOHN BRDA,  
GEORGIOS PALIKARAS,

Defendants.

Civ. Action No. 4:24-cv-1048-SDJ

**DECLARATION OF RYAN D. LANTRY IN SUPPORT OF DEFENDANT BRDA'S  
MOTION TO EXCLUDE IMPROPERLY OBTAINED EVIDENCE**

I, Ryan D. Lantry, declare and state as follows:

1. I am an attorney of the law firm DLA Piper LLP (US) and counsel for Defendant John Brda in the above-captioned matter. I have personal knowledge of every fact stated in this Affidavit, each of which is within my personal knowledge and is true and correct to the best of my ability. I submit this declaration in support of Defendant John Brda's Motion to Exclude Improperly Obtained Evidence.

2. I am an attorney in good standing, licensed to practice law in the State of Texas by the Supreme Court of Texas, and I have continuously practiced law in Texas since my licensing in October 2021. I am also licensed to practice law in all federal courts in the State of Texas.

3. The Securities and Exchange Commission (the "SEC") issued a Formal Order of Investigation, styled *In the Matter of Torchlight Energy Resources, Inc.* (FW-04461) dated August 3, 2021.

**EXHIBIT  
A**

4. Mr. Brda received a document subpoena dated April 14, 2022, as well as a testimony subpoena dated July 19, 2022.

5. Attached as **Exhibit A-1** is a true and correct copy of a document subpoena dated April 14, 2022 and a testimony subpoena dated July 19, 2022.

6. Mr. Brda produced responsive documents and sat for testimony on August 18, 2022 conducted.

7. On July 20, 2023, the SEC sent Mr. Brda a Wells Notice.

8. On January 17, 2024, Rogers notified Mr. Brda's counsel that the SEC had requested and received an extension of their deadline to file a case against Mr. Brda until April 16, 2024.

9. On May 20, 2024, Mr. Brda received a subpoena from the SEC for an investigation styled *In the Matter of MMTLP* (FW-04625), signed by Rogers.

10. On June 7, 2024, Rogers and Martin provided a copy of the SEC's Formal Order in the MMTLP Matter.

11. On June 18, 2024, counsel for Mr. Brda served an objection to the MMTLP Subpoena. Attached as **Exhibit A-2** is a true and correct copy of that objection.

12. Mr. Brda's counsel never received any response to the objection to the MMTLP Subpoena.

13. The SEC issued a subpoena to a third-party on or around December 2024, signed by Rogers. Attached as **Exhibit A-3** is a true and correct copy of the subpoena the SEC sent.


14. The SEC issued a subpoena to another third-party on or around December 2024, signed by Rogers. Attached as **Exhibit A-4** are true and correct excerpts of the subpoena the SEC sent.

15. In addition to the two subpoenas noted above, Mr. Brda is aware of at least two other subpoenas that the SEC has served on third parties and has reason to believe that additional subpoenas have been served.

16. Attached as **Exhibit A-5** is a true and correct copy of an Order issued in *In Matter of Morgan Asset Mgmt., Inc.*, Admin. Proceeding File No. 3-13847 (July 12, 2010).

I declare under penalty of perjury under the laws of the United States that the foregoing statements are true and correct to the best of my knowledge.

Executed this 26<sup>th</sup> day of February, 2025, in Dallas, Texas.

  
Ryan D. Lantry